



ORIGINAL

Office of the General Counsel
Michael A. Burgin
313.248.7746
mburgin@ford.com

Ford Motor Company
Parklane Towers West
Suite 1500
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

August 20, 2008

VIA OVERNIGHT MAIL AND ELECTRONIC MAIL

Joan Martin-Banks
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Peck Iron and Metal Site
Portsmouth, Virginia

Dear Ms. Martin-Banks:

It has come to my attention that Ford's verification of its Response to the United States Environmental Protection Agency's Request for Information was not included in the transmissions sent to you yesterday. Ford's verification is enclosed herein.

If you have any questions, please call me at 313-248-7746.

Regards,

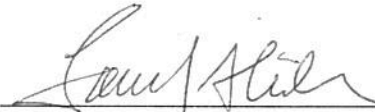

Michael A. Burgin

VERIFICATION

ORIGINAL

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

Louis J. Ghilardi, being duly sworn, deposes and states that he is an authorized agent of Ford Motor Company; that he verifies the foregoing Ford Motor Company's Response to Request for Information; that the matters stated therein are not within the personal knowledge of the undersigned; that the facts stated therein have been assembled by authorized employees and counsel for Ford Motor Company; and that the undersigned is informed that the facts stated therein are true.

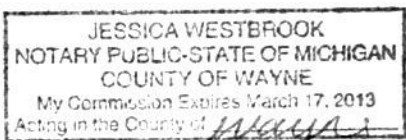


Louis J. Ghilardi
Assistant Secretary

Subscribed and sworn to before me this 19th day of August, 2008.



Notary Public





ORIGINAL

Office of the General Counsel
Michael A. Burgin
313.248.7746
mburgin@ford.com

Ford Motor Company
Parklane Towers West
Suite 1500
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

August 19, 2008

VIA OVERNIGHT MAIL AND ELECTRONIC MAIL

Joan Martin-Banks
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Peck Iron and Metal Site
Portsmouth, Virginia

Dear Ms. Martin-Banks:

Enclosed please find Ford Motor Company's Response to the United States Environmental Protection Agency's Request for Information.

If you have any questions, please call me at 313-248-7746.

Regards,


Michael A. Burgin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

In the Matter of:)	FORD MOTOR COMPANY'S
)	RESPONSE TO
Peck Iron and Metal Site)	REQUEST FOR INFORMATION
Portsmouth, VA)	

Ford Motor Company ("Ford") submits its responses and objections to the United States Environmental Protection Agency's ("USEPA") Request for Information ("Request") regarding the Peck Iron and Metal Site, Portsmouth, Virginia ("Site") as follows:

GENERAL OBJECTIONS

1. Ford objects to the definition of "document" and "documents" as overly broad and seeking to impose obligations that are unduly burdensome and not required by CERCLA or SARA;
2. Ford objects to the definition of "the company" and "your company" as overly broad and seeking to impose obligations that are unduly burdensome and not required by CERCLA or SARA;
3. Ford objects to the Request as overly broad to the extent it seeks information concerning facilities other than Ford's Norfolk Assembly Plant ("Norfolk").
4. Ford objects to the Request as unduly burdensome to the extent it seeks to impose any obligations on Ford that exceed those prescribed by CERCLA or SARA.

Ford reserves the right to supplement this Response if additional information is discovered.

PRELIMINARY STATEMENT

Without waiving any objection Ford may have, Ford provides the following

response to the Request for Information. Ford has conducted a reasonable search for information and documents regarding its Norfolk Assembly Plant, which ceased production operations on June 29, 2007. Based on information and belief, Ford states it sent scrap metal parts, primarily automobile parts, to the Site from 1965 to the mid-1980s. Due to the passage of time, however, Ford has located no responsive documents regarding the details of these transactions.

The following responses and specific objections are expressly subject to the general objections stated above.

Question No. 1

List all shipments of scrap materials, including scrap metal, which your company has sent to the Site. Include the date for each transaction, the type and quantity of scrap metal sent, the amount paid or collected in connection with each transaction, the method of payment, and identity of the person making or receiving payment.

Response

Based on information and belief, Ford states it sent scrap metal parts, primarily automobile parts, to the Site from 1965 to the mid-1980s. Due to the passage of time, however, Ford has located no responsive documents regarding the details of these transactions.

Notwithstanding Ford's response, Ford objects to this Question to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.

Question No. 2

For each shipment of scrap material identified in response to Question 1

above, identify:

- a. the source of the scrap material;
- b. the prior use of the scrap material;
- c. whether the scrap material was a collection of homogenous materials;
- d. whether the scrap material was tested for any hazardous substances prior to shipment to Peck Iron and Metal Co.

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 3

At the time of the transaction(s) involving scrap materials listed in your response to Question 1(a), what was the intended disposition of the scrap materials at the Site?

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 4

Did a market exist for the scrap metal listed in your response to Question 1, above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., ISRI, Department of Defense, or wherever your company would find the grade published).

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 5

What commercial specification grade did the scrap metal listed in your response to Question I (a) meet? Identify/list the commercial specification grades that each scrap metal identified in 1(a) met.

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 6

After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to Question 1(a) was to be made available for use as a feedstock for the manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 7

Could the scrap metal listed in your response to Question 1(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 8

Could any products to be made from the scrap metal listed in your response to Question 1(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.

Response

Ford incorporates by reference its response and objections to Question No. 1.

Question No. 9

Did your company process any of the scrap materials sent to Peck Iron and Metal Co. prior to transport and delivery to the Site? If yes, describe the process used and the purpose for subjecting the scrap material to the process.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Notwithstanding Ford's response, Ford objects to this Question to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.

Question No. 10

Was the transaction between your company and Peck Iron and Metal Co.: 1) an outright sale; 2) the subject of a written or verbal "tolling" agreement between the companies; or 3) the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Question No. 11

Did your company have a basis for believing that the scrap materials listed in your response to Question 1(a) would be recycled? If not, what was that basis? Provide supporting documentation.

Response

Due to the passage of time, Ford has located no documents or information

responsive to this request.

Question No. 12

Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap materials identified in your response to Question I (a) that may have been sold, transferred, or delivered to Peck Iron and Metal Co. at the Site.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Question No. 13

What steps (e.g., internal procedures, Federal, state, and local compliance inquiries) were taken by your company to ensure that Peck Iron and Metal Co., the recipient of the scrap materials listed in your response to Question 1(a), was in compliance with applicable Federal environmental regulations or standards, and any amendments, with respect to the scrap materials it received from your company?

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Question No. 14

Did your company have any basis for believing that the Peck Iron and Metal Co. facility at the Site was in compliance with substantive provisions of any Federal, state, or local environmental laws or regulations, or compliance order or decree applicable to the handling, processing, reclaiming, storage, or other management

activities associated with the scrap materials listed in your response to Question 1(a)? If so, identify that basis and provide supporting documentation.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Question No. 15

Describe the efforts your company undertook with respect to the management and handling of the scrap materials listed in your response to Question 1(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the scrap materials by hazardous substances.

Response

Ford incorporates by reference its response to Question No. 1.

Question No. 16

Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the scrap materials listed in your response to Question 1(a).

Response

Ford incorporates by reference its response to Question No. 1.

Question No. 17

Identify the person(s) answering these questions and requests for copies of documents on behalf of your company.

Response

This Response was prepared by Michael A. Burgin, Attorney, Office of the General Counsel, Ford Motor Company, Three Parklane Towers West, Suite 1500, Dearborn, Michigan, 48126, 313-248-7746.

Question No. 18

For each Request, identify all persons consulted in the preparation of the answer.

Response

This Response is the corporate response of Ford. Ford objects to the extent this Request seeks information that is protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Subject to its objections, Ford identifies the following individuals as providing assistance with Ford's corporate response:

Charlie Ball

Bill Boyd

Brian Bussa

Bill Charlton

Bob Comier

Gary Davis

Judy Wood

The above current and former Ford employees can be contacted through Ford's counsel.

Question No. 19

For each Request, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Request and provide true and accurate copies of all such documents.

Response

Due to the passage of time, Ford has located no documents regarding the scrap metal parts that Ford sent to the Site. The only document regarding the Site that Ford consulted was an excerpt from the deposition of Mr. Barry David Peck that USEPA provided.

Notwithstanding Ford's response, Ford objects to the extent this Request seeks information that is protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine.

Question No. 20

Describe in detail any agreement/contract your company has had with Peck Iron and Metal Company. In addition, identify any other company operating at the Site and describe in detail any arrangements your company has had with each such company, if any, including the time period of your company's involvement with such company.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Notwithstanding Ford's response, Ford objects to this request as overly broad to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.

Question No. 21

Provide all business records pertaining to your company and Peck Iron and Metal Company, or any other company operating at the Site, including:

- a. Copies of correspondence to and from these companies, including letters and memoranda (both internal and external);
- b. Copies of invoices, manifests, bills-of-lading, purchase orders, tickets, and any other documents pertaining to shipping, receiving, and transporting scrap materials; and
- c. Copies of all business records pertaining to sale, transfer, delivery, or disposal, of any hazardous substances, scrap materials, and/or recyclable materials to the Site. If you are unable to provide any or all of these documents, explain why, and what you did to find them.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Notwithstanding Ford's response, Ford objects to this request as overly broad to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.

Question No. 22

If you have reason to believe that someone could provide a more detailed or complete response to any of these questions or requests for copies of documents, or if you have reason to believe that there could be someone who may be able to provide additional documents that would be responsive to these questions and

requests for copies of documents, identify such person(s), identify the additional documents that they may have, and describe any information related to these questions that they may have.

Response

Due to the passage of time, Ford presently is unaware of anyone who likely would possess relevant documentation.

Question No. 23

Provide details, including dates and materials involved, of all on-site spills or releases of hazardous materials of which you have knowledge and that occurred during the processing of scrap materials containing hazardous substances at the Site.

Response

Due to the passage of time, Ford has located no documents or information regarding spills or releases at the Site.

Question No. 24

To the extent not identified in Question 1, identify all transactions or agreements for disposal in which your company gave, sold, or transferred any material or item, scrap materials, waste materials, pollutant, or contaminant, including copper-bearing material and ash, to the Site. In addition:

- a. State the dates on which each such person may have given, sold, transferred, or delivered such material.
- b. Describe the materials or items that may have been given, sold, transferred, or delivered, including the type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.

- c. Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.
- d. State whether any of the hazardous substances identified in subpart c. above exhibit any of the characteristics of a hazardous waste identified in 40 C.F.R. Section 261, Subpart C.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Notwithstanding Ford's response, Ford objects to this request as overly broad to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.

Question No. 25

What other materials, if any, did your company send to the Site (items/materials not covered in Question 24 above)?

- a. Describe the purpose of each sale, transfer, or delivery of materials to the Site.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Notwithstanding Ford's response, Ford objects to this request as overly broad to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.

Question No. 26

Describe what was done to materials indicated in your response to Questions 24 and 25 above once they were brought to the Site including any further processing of the materials.

Response

Ford incorporates by reference its response and objections to Question Nos. 24 and 25.

Question No. 27

Identify the person(s) who sold, transferred, delivered, and selected the Site as the location at which scrap materials from your company were to be disposed or treated.

- a. Identify all documents mentioning these arrangements for disposal.
- b. Describe all efforts (i.e., site visits) taken by the person(s) identified in your response to Question 25 above to determine what would be done with the materials that may have been sold, transferred, or delivered after such materials had been sold, transferred, or delivered to the Site.

Response

Due to the passage of time, Ford has located no documents or information responsive to this request.

Question No. 28

For each sale, transfer, or delivery of materials to the Site, had any hazardous substances been added to the materials described in your response to Questions 24 and 25 above? If so, identify the hazardous substance added and the person

responsible for adding such hazardous substance.

- a. Why were these hazardous substances added to the materials?
- b. Describe the source of or the process that produced the materials described in your response to Questions 24 and 25 above.

Response

Based on historical practice, Ford did not add hazardous materials to the scrap metal parts it sent to Peck Iron and Metal Company.

Question No. 29

Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). Hereafter, these individuals are referred to as environmental caretakers. For each environmental caretaker, indicate the dates of the individual's employment or contractual obligation (i.e., the dates indicating the length of the individual's tenure[s]), the nature of the individual's duties and responsibilities, and a description of the type of environmental information that the individual would know.

Response

Due to the passage of time, Ford has located no responsive documents.

Notwithstanding Ford's response, Ford objects to this request as overly broad to the extent it is not limited to Ford's Norfolk Assembly Plant and the relevant time period.



EPA

United States
Environmental Protection
Agency

Region 3

Hazardous Site Cleanup Division

1650 Arch Street

Philadelphia, PA 19103-2029

FAX TRANSMISSION

DATE: 07/01/08

PAGE 1 of 3

PLEASE DELIVER AT ONCE TO:

NAME: Michael Burgin Ford

FIRM NAME: 313-248-7746

PHONE: _____

FAX NUMBER: 313-390-3308

FROM: J. Martin Banks

PHONE: 215-814-3156

FAX NUMBER: 1-(215) 814-3005

COMMENTS/NOTE: _____

1 Q. And how long have you been employed with Peck?

2 A. About 12 years.

3 Q. How long has your corporation been in business,
4 Mr. Peck?

5 A. Little over 25 years.

6 Q. Could you list for us some of the customers that
7 you deal with, in your business?

8 A. Customers that we generally deal with, talking
9 about under contract, include Reynolds Metal Company, Bethlehem
10 Steel, Ford Motor Company, General Motors. These are people
11 that we have on generally long term contracts. And, for instance,
12 Reynolds Metal, we may handle several million dollars a year,
13 just with their material. And I could name a number of other
14 companies, if you like me to.

15 Q. Have you done business with Vepco?

16 A. Yes, we have.

17 Q. How long has it been since you have done business
18 with Vepco?

19 A. I think it's probably been since the time of this
20 situation.

21 Q. Do you know approximately how long that is?

22 A. Since January of this year.

23 Q. Can you tell us why you no longer are doing
24 business with Vepco?

CHECK RECONCILIATION
PECK RICHMOND RECYCLING CO.

PAGE: 4

09/30/92 9:00 AM
0004

FOR BANK C2 CRESTAR BANK
ACCT 1 RECYCLING ACCOUNT

AS OF 09/30/92

CHK/REF	DATE	SRC	VENDOR/EMP	NAME/DESC	TRAN	CLR DATE	-----CLEARED----- BANK AMT	SYST AMT	OPEN AMT
127401	09/25/92	AP	COMCONTROL	COMMONWEALTH CONTROLS	C				358.84
127402	09/25/92	AP	COMPUTER S	COMPUTER SALES & SERVICE	C				234.90
127403	09/25/92	AP	CELL VIRG	CONTEL CELLULAR OF VIRGINIA	C				67.03
127404	09/25/92	AP	CONTEL-RC	CONTEL CELLULAR OF VIRGINIA	C				59.05
127405	09/25/92	AP	CONTEL CE	CONTEL CELLULAR OF VIRGINIA	C				291.99
127406	09/25/92	AP	COPY SYS	COPY SYSTEMS INC	C				102.53
127407	09/25/92	AP	CPP PINK	CPP PINKERTON	C				6475.80
127428	09/25/92	AP	CP TELE	C & P TELEPHONE	C				4642.94
127429	09/25/92	AP	CRENSHAM	CRENSHAM CORP	C				9.66
127430	09/25/92	AP	DANV.PLYM.	DANVILLE CHRYSLER PLYMOUTH	C				98.13
127431	09/25/92	AP	DEPT WORKS	CITY OF DANVILLE	C				37.50
127432	09/25/92	AP	DHL AIRWAY	DHL AIRWAYS, INC.	C				77.00
127433	09/25/92	AP	DIXI BRG.	DIXIE BEARINGS	C				407.40
127434	09/25/92	AP	DORSEY	DORSEY RUBBER & EQUIP.	C				559.85
127435	09/25/92	AP	DRAMEX	DRAMEX INTERNATIONAL INC.	C				1549.00
127436	09/25/92	AP	DUBOSE	DUBOSE STEEL, INC.	C				736.51
127437	09/25/92	AP	EAST PENN	EAST PENN MANUFACTURING CO INC	C				656.55
127438	09/25/92	AP	EASTRN RAL	EASTERN RAILWAY SUPPLIES, INC.	C				388.00
127439	09/25/92	AP	EAST STEEL	EASTERN STEEL FASTENERS INC.	C				301.10
127440	09/25/92	AP	EDGEHILL S	EDGEHILL SHELL	C				65.08
127441	09/25/92	AP	ELEC EQUIP	ELECTRICAL EQUIPMENT CO.	C				1938.35
127442	09/25/92	AP	FED. EXP.	FEDERAL EXPRESS INC.	C				16.50
127443	09/25/92	AP	FISHER	FISHER AUTO PARTS	C				35.12
127444	09/25/92	AP	FLORIDA ST	FLORIDA STEEL CORPORATION	C				7407.57
127445	09/25/92	AP	FORD MOTOR	FORD MOTOR CREDIT COMPANY	C				930.00
127446	09/25/92	AP	GENUINE CO	GENUINE PARTS COMPANY	C				1325.95
127449	09/25/92	AP	G E SUPPLY	G E SUPPLY	C				455.17
127450	09/25/92	AP	GINN M S	M S GINNS CO	C				134.68
127451	09/25/92	AP	GLOBAL EQU	GLOBAL BUSINESS SUPPLIES	C				60.93
127452	09/25/92	AP	GRAINGER	W W GRAINGER INC	C				826.53
127453	09/25/92	AP	GRAYBAR	GRAYBAR ELECTRIC CO INC	C				117.12
127455	09/25/92	AP	GREAT DANE	GREAT DANE TRAILERS INC	C				4636.20
127456	09/25/92	AP	GRETA TIRE	GRETA TIRE COMPANY.	C				215.54
127457	09/25/92	AP	GROOME	GROOME TRANSPORTATION INC.	C				30.75
127458	09/25/92	AP	GTE VA	GTE VIRGINIA	C				587.06
127459	09/25/92	AP	HARRIS GRP	HARRIS GROUP	C				13315.00
127460	09/25/92	AP	HEARTLAND	HEARTLAND COMMUNICATIONS GROUP	C				39.00
127461	09/25/92	AP	HVYTRKPTS	HEAVY TRUCK PARTS & SERVICE	C				1700.00
127462	09/25/92	AP	HENSLEY	HENSLEY FORKLIFT PARTS	C				155.00
127463	09/25/92	AP	HWY IND.	HIGHWAY AND INDUSTRIAL	C				175.81
127464	09/25/92	AP	HULL STRET	HULL STREET OUTLET, INC.	C				1069.19
127465	09/25/92	AP	HYDRL TRK	HYDRAULICS, TRUCK	C				50.68
127466	09/25/92	AP	IND SUPPLY	INDUSTRIAL SUPPLY CORP.	C				1892.36
127467	09/25/92	AP	IND TRANS	INDUSTRIAL TRANSMISSION	C				433.94
127468	09/25/92	AP	INTERIM	INTERIM PERSONNEL	C				3150.00
127469	09/25/92	AP	IRON AGE	IRON AGE CORPORATION	C				169.13
127470	09/25/92	AP	JAMES RIVR	JAMES RIVER EQUIPMENT INC.	C				5028.04
127471	09/25/92	AP	JAMES	JAMES RIVER PETROLEUM	C				19073.93

** yep, correct*

INTERVIEW SUMMARY

Task Order 0001 Site 24

Peck Iron and Metal Site

(b) (6)

Prepared for:

U.S. Environmental Protection Agency

Region 3

Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

Chenega Integrated Systems, LLC

5911 Kingstowne Village Parkway
Suite 300
Alexandria, VA 22315

Work Assignment Number:

Date Submitted:

Contract Number:

EPA Work Assignment Manager:

Telephone Number:

Chenega Project Manager:

Telephone Number:

Interviewer:

Task Order 0001 Site 24

March 31, 2009

EP-S3-04-01

Joan Martin-Banks

(215) 814-3156

(b) (4)

(b) (6)

Name: (b) (6) WITNESS")
(b) (6)

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: March 25, 2009

On March 25, 2009 the WITNESS was interviewed at his residence by (b) (4) Senior Investigator, of (b) (4) the WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by the Peck Iron and Metal Company from approximately 1978 to 1995.

The WITNESS stated that he was initially hired by PIM to work at the Pinners Point location. The WITNESS explained that Pinners Point ("PP") was a Peck owned and operated ship breaking operation.

The WITNESS stated that he was hired by Peck as a safety officer at PP. The WITNESS stated that he supervised the breaking operation and insured that the laborers and torch operators operated safely.

The WITNESS stated that Julius Peck purchased large ships from the U.S. Navy and transported the ships to the PP operation. The WITNESS stated that these ships were usually gutted. The WITNESS stated that these ships included aircraft carriers, destroyers and submarines.

When asked the names of any of these ships, the WITNESS stated that he cannot recall.

When asked to describe the scrap that was retrieved from the ships at PP, the WITNESS provided the following.

The WITNESS stated that most of the scrap consisted of steel, iron, steel beams, turbines and stainless steel.

The WITNESS explained that when the hulls and steel compartments were cut up by setline torches someone had to be stationed on the other side of the structure being cut. The WITNESS stated that the torching process generated a melted substance known as "slag". The WITNESS stated that the slag consisted of metal shavings and paint. The WITNESS stated that this substance was highly flammable and was contained in buckets.

When asked where PP transported the scrap from the cutting operation at PP, the WITNESS stated that the scrap was transported to the PIM yard in Portsmouth.

The WITNESS stated that in 1980 he was transferred from PP to the PIM yard in Portsmouth. The WITNESS stated that he was assigned to the scale house and was the primary operator of the scale operation.

The WITNESS explained that all loads of scrap entered the PIM yard at the scale house. The WITNESS explained that he filled out a weigh ticket with information that included the name of the truck driver, type of the scrap, name of the company and the weight of the contents of the truck. The WITNESS explained that he provided a copy of the weigh ticket to the truck driver and turned in the original ticket to the office.

The WITNESS stated that scrap purchased by Peck through bids or in bulk bypassed the scale house. The WITNESS stated that he does not know the types of this scrap or the names of the companies who sold this scrap to PIM.

When asked to describe the types of scrap that was purchased by PIM and that came through the scale house, the WITNESS provided the following.

- copper
- brass
- mixed steel
- aluminum
- stainless steel
- iron

When asked the names of the businesses who sold scrap metal to PIM and to describe the types of scrap metal for each company, the WITNESS stated that he has a failing memory and cannot recall specific names.

When asked if he reviewed a list of company names would help his memory, the WITNESS stated possibly.

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA.

ABB National Industries, Hampton, VA: Could not recall.

Alcoa (Reynolds):

- The WITNESS stated that he recalls Alcoa bringing in aluminum. The WITNESS could not recall how often Alcoa sold aluminum to PIM.

American Gem Corporation, Chesapeake, VA: Could not recall.

Anheuser-Busch, Inc., Williamsburg, VA: Could not recall.

Argent Marine, Solomons, MD: Could not recall.

Associated Naval Architects, Inc., Portsmouth, VA: Could not recall.

CSX Transportation Co., Charlotte, NC: Could not recall.

Electric Motor and Contracting Co., Chesapeake, VA: Could not recall.

Ford Motor Company, Norfolk, VA:

- The WITNESS stated that Ford Motor Company occasionally sold car bodies that had been damaged to PIM. The WITNESS stated that the car bodies included the batteries and tires.

General Electric Company, Richmond, VA: Could not recall.

General Foam Plastics Corp., Norfolk, VA: Could not recall.

General Motors Corporation: Could not recall.

Gwaltney Company, Portsmouth, VA: Could not recall.

Newport News Shipbuilding and Dry Dock Co., Newport News, VA ("NNSD"):

- The WITNESS stated that NNSD sold scrap to PIM on both a bid basis and spot sale basis. The WITNESS stated that the spot sale scrap was brought through the scale house. The WITNESS could not recall the types of scrap.

Norfolk Shipbuilding and Dry Dock Co., Norfolk, VA: Could not recall.

Overhead Door Company, Virginia Beach, VA: Could not recall.

Phillip Morris, Inc., Richmond, VA: Could not recall.

Plasser American, Chesapeake, VA: Could not recall.

Potomac Electric Power Co., Washington, D.C.: Could not recall.

Power Mechanical, Inc., Hampton, VA: Could not recall.

Southeastern Public Service Authority, Chesapeake, VA: Could not recall.

Sumitomo Machinery Corp., Chesapeake, VA: Could not recall.

U. S. Navy, Norfolk, VA:

- The WITNESS stated that the U.S. Navy sold scrap metal to PIM on a bid basis and the WITNESS did not know the types or amount of scrap that PIM purchased from the Navy.

(b) (6)

AMF Bowling, Richmond, VA: Could not recall.
Alcatel-Lucent, Murry Hill, NJ: Could not recall.
Brenco, Petersburg, VA: Could not recall.
Carolina Steel Corporation, Greensboro, NC: Could not recall.
Chesapeake Corporation, Richmond, VA: Could not recall.
Dean Foods, Dallas, Texas: Could not recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: Could not recall.
Federal-Mogul Corporation, Southfield, MI: Could not recall.
GATX Corporation, Chicago, IL: Could not recall.
The Hon Company, Muscatines, IA: Could not recall.
IGM USA Inc., Charlotte, NC: Could not recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern Corporation, Norfolk, VA: Could not recall.
Pizzagalli Construction Company, Garner, NC: Could not recall.
Schlumberger Industries, Houston, TX: Could not recall.
Seaboard Marine, Miami, FL: Could not recall.
Stanley Hardware, New Britain, CT: Could not recall.
Super Radiator Coils, Richmond, VA: Could not recall.
Waste Management (Chambers Waste Systems of Virginia): Could not recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.

The WITNESS stated that many of the companies mentioned above could have been customers of PIM. The WITNESS indicated that he could not recall any specifics at the present time.

When asked the names of other PIM employees, the WITNESS provided the following.

- William Brewster

(b) (6)

When asked if he knows the whereabouts of any records at PIM, the WITNESS stated no.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

(b) (6)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: (b) (6)

(b) (6)

The WITNESS and his wife are in the process of moving into an assisted living facility.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated yes.

Suggested follow-up Interviews:

- (b) (6)

INTERVIEW SUMMARY
Task Order 0001 Site 004
Peck Iron and Metal Site

Harold B. Schultz

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

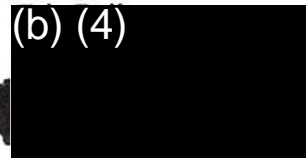
Prepared by:

Chenega Global Services, LLC
726 East 9th Avenue
Anchorage, AK 99501

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 004
September 25, 2009
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)

A large black rectangular redaction box covers the contact information for the interviewee, including their name and phone number.

Name: Harold B. Schultz (WITNESS)

(b) (6)

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: September 21, 2009

On September 21, 2009 the WITNESS was interviewed at his residence by (b) (4) (b) (4) Senior Investigator, of (b) (4) (b) (4). The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 004 the Peck Iron and Metal Site, Portsmouth, VA (the "Site"). The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with the Peck Iron and Metal Site located in Portsmouth, VA (PIM).

The WITNESS stated that he was employed by Peck Iron and Metal (PIM) from 1954 to 1995. The WITNESS stated that he initially worked at the Richmond, VA location. The WITNESS stated that over the 41 years he worked for PIM, he was periodically sent to the PIM facility in Portsmouth. The WITNESS stated that he also worked at the Portsmouth PIM facility on a part-time basis from 1995 to 1996.

When asked to describe his duties while employed by PIM, the WITNESS provided the following:

The WITNESS stated that he was a salesman and coordinator for customer service. The WITNESS stated that he occasionally filled in at the scale house at the Portsmouth PIM.

When asked to describe his duties when he worked on the scales at PIM Portsmouth, the WITNESS provided the following:

The WITNESS stated that scrap purchased from bids did not pass through the scales. The WITNESS stated that trucks transporting scrap from bids were sent directly to the yard and separated by the workers in the yard.

The WITNESS stated that all other scrap transported to the PIM Portsmouth was weighed at the scale. The WITNESS stated that he would inspect the contents of the load and complete a hand written sheet identifying the type of waste that was in the truck. The truck would then proceed to the yard, empty its load, and return to the scale empty. The WITNESS stated that the truck was weighed empty.

The WITNESS was asked to describe procedures at PIM Portsmouth when hazardous waste was part of the scrap.

The WITNESS stated that prior to approximately 1980 there were no specific procedures when handling hazardous waste.

When asked if PIM Portsmouth accepted electrical transformers, the WITNESS stated yes. The WITNESS explained that the U.S. Navy and Virginia Power Company brought in electrical transformers. The WITNESS stated that the transformers were supposed to be empty of any liquid. The WITNESS stated that PIM Portsmouth bid on bulk scrap from Virginia Power and the U.S. Navy. The WITNESS stated that this scrap would also include condensers. The WITNESS stated that he does not know how this metal was sold.

The WITNESS was asked if batteries were accepted at PIM Portsmouth. The WITNESS stated yes. The WITNESS stated that cars were brought in by private individuals, as well as General Motors. The WITNESS stated that he does not know how the batteries were disposed of or sold. The WITNESS stated that "in the old days" batteries were broken up. The WITNESS stated that he does not know how the broken batteries were disposed of.

The WITNESS was asked to identify companies whose scrap was purchased at PIM Portsmouth.

- Southeastern Public Service Authority ("SPSA"): The WITNESS stated that the SPSA operated landfill was located on the border of PIM off of Victory Boulevard. The WITNESS stated that a portion of the landfill was on the PIM property. The WITNESS stated that SPSA sold scrap to PIM.
- Newport News Shipbuilding and Dry Dock Company ("NNSD"): The WITNESS stated that PIM bid on contracts with the NNSD when NNSD was refurbishing ships. The WITNESS stated that PIM Portsmouth purchased scrap metal from NNSD. The WITNESS stated that he does not know what type of scrap metal was purchased.
- Ford Motor Company: The WITNESS stated that Ford brought in car bodies. The WITNESS stated that PIM operated a car crusher, and that these cars were crushed. The WITNESS stated that the crushed cars were shipped to the PIM facility at Richmond.
- Alcoa: The WITNESS stated that Alcoa brought in aluminum to PIM on a regular basis. The WITNESS stated that he has no further information relating to Alcoa.

- U.S. Navy: The WITNESS stated that the U.S. Navy was one of the biggest customers of PIM Portsmouth, and that PIM bid on numerous contracts with the Navy to purchase scrap. The WITNESS has no further information relating to the U.S. Navy.

When asked the names of other employees at PIM, the WITNESS provided the following:

- (b) (6)
- David Peck
- Bill Brewster
- (b) (6)

The WITNESS was asked if he had any knowledge of the following companies' waste or scrap being sold to PIM, or disposed at the PIM facility in Portsmouth, VA.

ABB National Industries, Hampton, VA: Cannot recall.
Alcoa (Reynolds): See comments above.
American Gem Corporation, Chesapeake, VA: Cannot recall.
Anheuser-Busch, Inc., Williamsburg, VA: Cannot recall.
Argent Marine, Solomons, MD: Cannot recall.
Associated Naval Architects, Inc., Portsmouth, VA: Cannot recall.
CSX Transportation Co., Charlotte, NC: Cannot recall.
Electric Motor and Contracting Co., Chesapeake, VA: Cannot recall.
Ford Motor Company, Norfolk, VA: See comments above.
General Electric Company, Richmond, VA: Cannot recall.
General Foam Plastics Corp., Norfolk, VA: Cannot recall.
General Motors Corporation: Cannot recall.
Gwaltney Company, Portsmouth, VA: Cannot recall.
Newport News Shipbuilding and Dry Dock Co.: See comments above.
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: Cannot recall.
Overhead Door Company, Virginia Beach, VA: Cannot recall.
Phillip Morris, Inc., Richmond, VA: Cannot recall.
Plasser America, Chesapeake, VA: Cannot recall.
Potomac Electric Power Co., Washington, D.C.: Cannot recall.
Power Mechanical, Inc., Hampton, VA: Cannot recall.
Southeastern Public Service Authority, Chesapeake, VA: See comments above.
Sumitomo Machinery Corp., Chesapeake, VA: Cannot recall.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling, Richmond, VA: Cannot recall.
Alcatel-Lucent, Murray Hill, NJ: Cannot recall.
Brenco, Petersburg, VA: Cannot recall.
Carolina Steel Corporation, Greensboro, NC: Cannot recall.
Chesapeake Corporation, Richmond, VA: Cannot recall.
Dean Foods, Dallas, Texas: Cannot recall.
E.I. DuPont de Nemours and Company, Inc., Wilmington, DE: Cannot recall.
Federal-Mogul Corporation, Southfield, MI: Cannot recall.

GATX Corporation, Chicago, IL: Cannot recall.
The Hon Company, Muscatines, IA: Cannot recall.
IGM USA, Inc., Charlotte, NC: Cannot recall.
Kraft Foods, Northfield, IL: Cannot recall.
Norfolk Southern Corporation, Norfolk, VA: Cannot recall.
Pizzagalli Construction Company, Garner, NC: Cannot recall.
Schlumberger Industries, Houston, TX: Cannot recall.
Seaboard Marine, Miami, FL: Cannot recall.
Stanley Hardware, New Britain, CT: Cannot recall.
Super Radiator Coils, Richmond, VA: Cannot recall.
Waste Management (Chambers Waste Systems of Virginia): Cannot recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Cannot recall.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: (b) (6)

(b) (6)

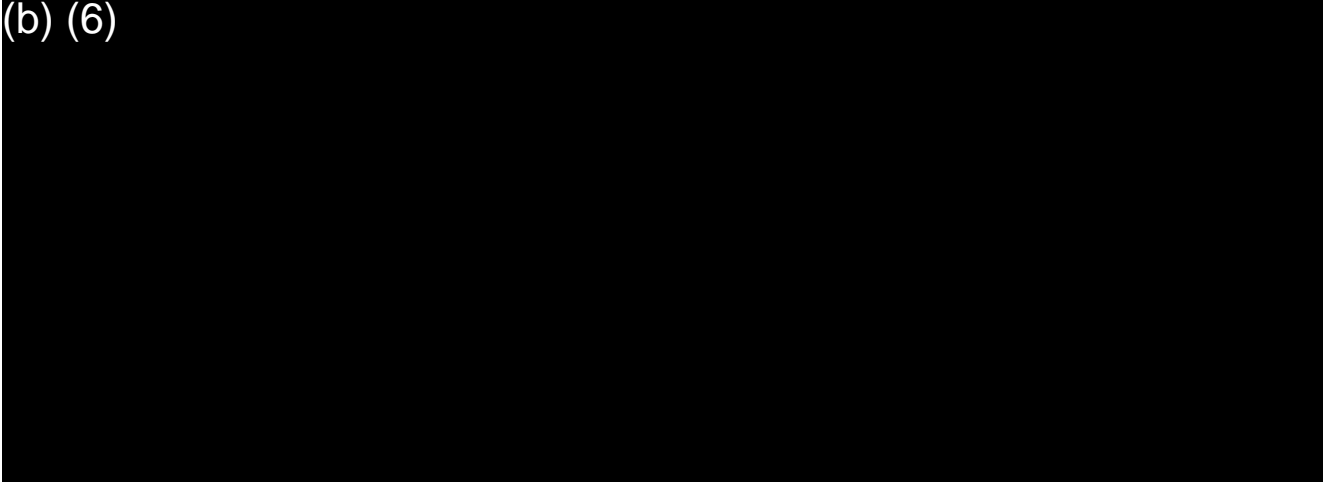
The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.


Suggested follow-up Interviews:

- (b) (6)

(b) (6)



(b) (6)



INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

Thomas L. Lundie

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

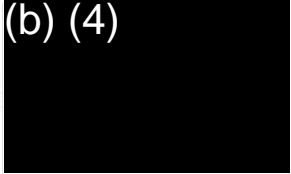
Prepared by:

Chenega Integrated Systems, LLC
5911 Kingstowne Village Parkway
Suite 300
Alexandria, VA 22315

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
February 17, 2009
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)

A large black rectangular redaction box covering the contact information for the interviewee.

Name: Thomas L. Lundie (WITNESS)

(b) (6)

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: February 10, 2009

On February 10, 2009 the WITNESS was interviewed at his residence by

(b) (4)

(b) (4) The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by Peck Iron and Metal located in Portsmouth, VA from 1970 to 1998. The WITNESS stated that PIM closed down in 1998.

When asked to describe his duties while employed by PIM, the WITNESS provided the following.

The WITNESS stated that he was the head mechanic and provided repairs and maintenance to all of the equipment operated by PIM.

When asked to describe the types of equipment operated by PIM, the WITNESS provided the following.

- Tractors: The WITNESS stated that PIM operated six tractors. The WITNESS stated that these tractors were used to transport containers to client's locations. The WITNESS stated that PIM owned numerous containers which were 20 feet to 40 feet long. The WITNESS did not know the cubic feet dimensions. The WITNESS explained that the containers were placed at locations where PIM received contracts to take scrap metal. The WITNESS explained that when the containers were half full the

customer called PIM and a tractor was sent to pick up the container and transport the container to PIM.

- Railroad cranes. The WITNESS stated that PIM operated four railroad cranes. The WITNESS explained that railroad cranes were cranes mounted on a railroad platform and operated on the railroad spur located on the PIM property. The WITNESS stated that the cranes were moved up and down the spur and unloaded rail cars that entered the PIM property containing scrap metal.
- Caterpillars: The WITNESS stated that PIM operated two caterpillars that were used to move metal that was placed on the yard at PIM.

The WITNESS stated that he worked on these vehicles in a garage located on the east end of the property.

The WITNESS was asked to identify the PIM customers who sold scrap metal to PIM.

The WITNESS explained that he did not have day to day exposure to the scrap operation at PIM. The WITNESS stated that his knowledge is limited. The WITNESS then provided the following information.

- Southeastern Public Service Authority ("SPSA"): The WITNESS stated that the SPSA operated landfill was located on the border of PIM off of Victory Boulevard. The WITNESS stated that a portion of the landfill was on the PIM property.
- Smithfield Ham Company ("SHC"): The WITNESS stated that he recalls SHC selling condensers to PIM. The WITNESS stated that these condensers were sometimes stored in one of the Proctor and Gamble buildings located adjacent to PIM. The WITNESS stated that PIM eventually purchased the Proctor and Gamble buildings and property that were located adjacent to the PIM operation. The WITNESS does not recall the time period that Proctor and Gamble was purchased.
- Newport News Shipbuilding and Dry Dock Company ("NNSD"): The WITNESS stated that PIM bid on contracts with the NNSD when NNSD was refurbishing ships. The WITNESS stated that PIM placed containers at the NNSD and that the NNSD employees loaded these containers. The WITNESS stated that PIM trailers picked up these containers when they were full and transported these containers to PIM. When asked to identify the types of scrap in the containers the WITNESS stated that he was only aware of steel and iron.
- Ford Motor Company: The WITNESS stated that Ford brought in car bodies. The WITNESS stated that PIM operated a car crusher and that these cars were crushed. The WITNESS stated that most of the crushed cars were shipped to the Peck operation located in Richmond, VA. The WITNESS explained that PIM did not have a shredder, but the Peck operation in Richmond did have a shredder. When asked if

PIM operated a sheerer, the WITNESS stated yes. The WITNESS explained that the crushed cars were too large to be processed through the sheerer.

- Alcoa: The WITNESS stated that Alcoa brought in aluminum to PIM on a regular basis. The WITNESS stated that he has no further information relating to Alcoa.
- U.S. Navy: The WITNESS stated that the U.S. Navy was one of the biggest customers of PIM and that PIM bid on numerous contracts with the Navy to purchase scrap. The WITNESS has no further information relating to the U.S. Navy.

When asked the names of other employees at PIM, the WITNESS provided the following.

(b) (6)

- David Kintle
- Christine Perry

When asked if he was aware of the Peck Equipment Company the WITNESS stated yes. The WITNESS stated that the Peck Equipment Company was located on George Washington Highway next to PIM. The WITNESS stated that the Peck Equipment Company stored turbines and pumps in one of the Proctor and Gamble buildings. The WITNESS had no further information relating to the Peck Equipment Company.

When asked to explain the duties of each of the Pecks who worked at PIM, The WITNESS provided the following.

- Julius Peck: The WITNESS stated that Julius Peck was the owner and in charge of all of the Peck operations.
- David Peck: The WITNESS stated that David Peck was in charge of the Peck operations located in Richmond, VA.
- Stanley Peck: The WITNESS stated that Stanley Peck was in charge of the Peck Equipment Company.
- Aaron Peck: The WITNESS stated that Aaron Peck was the general foreman at PIM.

When asked if Victor Peck worked at PIM, the WITNESS stated occasionally. The

WITNESS stated that (b) (6)

(b) (6)

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA.

ABB National Industries, Hampton, VA: Cannot recall.

Alcoa (Reynolds): See comments above.

American Gem Corporation, Chesapeake, VA: Cannot recall.

Anheuser-Busch, Inc., Williamsburg, VA: Cannot recall.

Argent Marine, Solomons, MD: Cannot recall.

Associated Naval Architects, Inc., Portsmouth, VA: Cannot recall.
CSX Transportation Co, Charlotte, NC: Cannot recall.
Electric Motor and Contracting Co., Chesapeake, VA: Cannot recall.
Ford Motor Company, Norfolk, VA: See comments above.
General Electric Company, Richmond, VA: Cannot recall.
General Foam Plastics Corp., Norfolk, VA: Cannot recall.
General Motors Corporation: Cannot recall.
Gwaltney Company, Portsmouth, VA: Cannot recall.
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.
Norfolk Shipbuilding and Dry Dock Co., Norfolk, VA: Cannot recall.
Overhead Door Company, Virginia Beach, VA: See comments above.
Phillip Morris, Inc., Richmond, VA: Cannot recall.
Plasser America, Chesapeake, VA: Cannot recall.
Potomac Electric Power Co., Washington, D.C.: See comments above.
Power Mechanical, Inc., Hampton, VA: Cannot recall.
Southeastern Public Service Authority, Chesapeake, VA: See comments above.
Sumitomo Machinery Corp., Chesapeake, VA: Cannot recall.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling, Richmond, VA: Cannot recall.
Alcatel-Lucent, Murry Hill, NJ: Cannot recall.
Brenco, Petersburg, VA: Cannot recall.
Carolina Steel Corporation, Greensboro, NC: Cannot recall.
Chesapeake Corporation, Richmond, VA: Cannot recall.
Dean Foods, Dallas, Texas: Cannot recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: Cannot recall.
Federal-Mogul Corporation, Southfield, MI: Cannot recall.
GATX Corporation, Chicago, IL: Cannot recall.
The Hon Company, Muscatines, IA: Cannot recall.
IGM USA Inc., Charlotte, NC: Cannot recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern Corporation, Norfolk, VA: Cannot recall.
Pizzagalli Construction Company, Garner, NC: Cannot recall.
Schlumberger Industries, Houston, TX: Cannot recall.
Seaboard Marine, Miami, FL: Cannot recall.
Stanley Hardware, New Britain, CT: Cannot recall.
Super Radiator Coils, Richmond, VA: Cannot recall.
Waste Management (Chambers Waste Systems of Virginia): Cannot recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Cannot recall.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS was cooperative and forthcoming. He is (b) (6) and was very mentally aware.

The WITNESS indicated that he was focused on keeping the equipment running and did not pay much attention to the scrap metal operation.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.

Suggested follow-up Interviews:

(b) (6)

- David Knittle